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14 BIG GRRRL BIG TOURING, INC.

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 ASHA DANIELS, an Individual;  
14  
15 Plaintiff,  
16  
17 vs.

18 BIG GRRRL BIG TOURING, INC., a  
19 Delaware Corporation; MELISSA  
20 JEFFERSON (aka "LIZZO"), as an  
21 Individual; CARLINA GUGLIOTTA, as  
22 an Individual; AMANDA NOMURA, as  
23 an Individual, and DOES 1 through 10,  
24 inclusive,  
25  
26 Defendants.

Case No. 2:24-cv-03571 FLA (PVCx)

[Hon. Fernando L. Aenlle-Rocha;  
Magistrate Judge: Hon. Pedro V. Castillo]

**DEFENDANT BIG GRRRL BIG  
TOURING, INC.'S WITNESS LIST**

Final Pretrial Conference:

November 14, 2025

Trial Date: December 1, 2025

Action Filed: September 21, 2023

Action Removed: April 30, 2024

Witness's Name*, Title, Affiliation (If Relevant) <sup>1</sup>	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
<p>Carlina Gugliotta, former BGBT Tour Manager</p> <p>c/o Lavelly &amp; Singer, P.C., 2049 Century Park E., Suite 2400 Los Angeles, CA 90067 (310) 556-3501</p>	<p>Will testify about her observations of interactions and working relationship between Daniels and Nomura; communications with Daniels regarding complaints about Nomura; her investigation of Daniels' claims and recommendation that Daniels create audio record of alleged improper conduct by Nomura; the decision to terminate Daniels; that she did not receive complaints about sexual harassment, any purported disability or request for accommodations from Daniels; and refute Daniels' claims. Testimony is unique because Gugliotta was Plaintiff's supervisor.</p>	1.5 hours		
<p>Chris Coffie, former BGBT Production Manager</p> <p>c/o Lavelly &amp; Singer, P.C., 2049 Century Park E., Suite 2400</p>	<p>Will testify regarding tour safety protocols; his observations of Daniels' failure to follow tour, local and safety rules; that he received no complaints from Daniels</p>	.75 hours		

<sup>1</sup> Witnesses marked with an asterisk will be called for direct only if need arises.

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Los Angeles, CA 90067 (310) 556-3501	of racial harassment, sexual harassment, any purported disability or request for accommodations; his observations of Daniels' behavior after termination; the decision to terminate Daniels; and refute Daniels' claims. Testimony is unique because Coffie was one of a handful of members of Tour management to whom Plaintiff could report alleged issues.			
Amanda Nomura, former BGBT Wardrobe Manager  c/o Lavelly & Singer, P.C., 2049 Century Park E., Suite 2400 Los Angeles, CA 90067 (310) 556-3501	Will testify regarding her observations of Daniels' failure to follow tour, local and safety protocols and instructions; her observations of Daniels' post-termination conduct; Daniels' job duties and issues with her job performance; her lack of authority to take tangible employment action against Daniels; and refute Daniels' claims that she allegedly subjected Daniels to sexual and racial harassment or discriminated against her because of any purported disability. Testimony is unique because Nomura	2 hours		

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	is the focus of almost all Plaintiff's allegations and is in a position to refute all of Plaintiff's claims.			
Dulce Martin, former BGBT Production Assistant*  Address unknown Mexico +(52)(55)1849-3769	Will testify regarding Daniels' failure to follow tour, local and safety rules; that she received no complaints from Daniels of racial harassment, sexual harassment, any purported disability or request for accommodations; her interactions with Daniels after termination; the decision to terminate Daniels. Testimony is unique because Martin was one of a handful of members of Tour management to whom Plaintiff could report alleged issues.	.5 hours		
Kyle Gaines, former BGBT Ambiance  c/o Lavelly & Singer, P.C., 2049 Century Park E., Suite 2400 Los Angeles, CA 90067 (310) 556-3501	Will testify regarding Daniels' alleged allergic reaction and behavior after termination; Daniels' plans the night before her termination; and refute Daniels' claims of sexual harassment involving Gaines. Testimony is unique because Gaines is the subject of Plaintiff's sexual hostile work	.25 hours		

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	environment claims and is in a position to refute those allegations.			
Molly Gordon, former BGBT B-Team Tour Manager*  c/o Lavelly & Singer, P.C., 2049 Century Park E., Suite 2400 Los Angeles, CA 90067 (310) 556-3501	Will testify that she received no complaints from Daniels of racial harassment, sexual harassment, any purported disability or request for accommodations; will refute Daniels' claims regarding her alleged wrongful conduct. Testimony is unique because Gordon was one of a handful of members of Tour management to whom Plaintiff could report alleged issues and she is in a position to refute claims of her alleged misconduct.	.25 hours		
Kevin Beisler, Full Stop Management  c/o Lavelly & Singer, P.C., 2049 Century Park E., Suite 2400 Los Angeles, CA 90067 (310) 556-3501	Will testify regarding Tour environment; how tours work and how The Special Tour worked; the makeup of Tour personnel; and refute Daniels' claims. Testimony unique because Beisler is the personal manager of Lizzo and oversees all tour operations.	1 hour		
Ashley Joshi, PS Business Management*	Will testify regarding number of employees during Daniels' employment and that	0.25 hours		

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235 Park Avenue South, 9 <sup>th</sup> Floor New York, NY 10003 (212) 246-7433	Daniels was paid in full for her time on the tour. Testimony is unique because Joshi was directly involved in payroll and employment onboarding.			
Cat Marcasciano, Defendant BGBT's Corporate Representative*  235 Park Avenue South, 9 <sup>th</sup> Floor New York, NY 10003 (212) 246-7433	Will testify that Daniels was paid in full for her time on the tour and the number of employees BGBT had prior to and during Daniels' employment (if Joshi not called); discuss company and tour protocols, philosophies and policies; and confirm Daniels was never employed nor paid by BGBT for costume design. If Joshi is not called, testimony is unique because she has knowledge of payroll and employment onboarding as corporate representative of BGBT.	0.75 hours		
Asha Daniels, Plaintiff*  c/o West Coast Employment Lawyers, APLC 1147 S. Hope St. Los Angeles, CA 90015 (213) 927-3700	Will testify regarding claims asserted in action.	2.5 hours	2.5 hours <i>Defendant anticipates examining Daniels for a total of 5 hours between cross and direct examination</i>	

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			<i>with allocation to be determined at trial depending on cross examination during presentation of Plaintiff's case.</i>	
Dr. James Rosenberg, Defendant's Expert Witness*  30700 Russell Ranch Road, Suite 250 Westlake Village, CA 91362 (818) 865-2978	Will testify regarding Daniels' emotional distress damages as rebuttal to Daniels' expert witness, Dr. Judy Ho.	3 hours		

Dated: October 17, 2025

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